

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Liliana Carolina Yanes,	)	
	)	<b>OFFER OF JUDGMENT</b>
Plaintiff(s),	)	
	)	<b>Case No. 23-cv-09454 (AYS)</b>
-against-	)	
	)	
Nilkhant 2 Car Wash, LLC d/b/a Bethpage Car Wash,	)	
Rakeshbhai Patel, Darpan Patel and Ronak Patel,	)	
	)	
Defendant(s).	)	
	)	

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TO: MOSER LAW FIRM, P.C.  
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*Attorneys for Plaintiff*

1. Pursuant to Fed. R. Civ. P. 68, Defendants Nilkhant 2 Car Wash, LLC d/b/a Bethpage Car Wash, Rakeshbhai Patel, Darpan Patel and Ronak Patel, jointly and severally, offer to allow the Plaintiff, Liliana Carolina Yanes, to have judgment against them, jointly and severally, in the amount of TWENTY FIVE THOUSAND DOLLARS (\$25,000.00), inclusive of all legal fees, interest, and costs, with such judgment to be paid ON OR BEFORE January 31, 2025;

2. Pursuant to NYLL § 198(4) said judgment shall contain a provision stating that if it is not paid in full on or before January 31, 2025, the amount of said judgment will automatically increase by (\$3,750.00) 15%;

3. Pursuant to NYLL § 198(4) said judgment shall contain a provision stating that if it is not paid in full on or before January 31, 2025, Plaintiff "shall have the right to collect [additional] attorney's fees and costs incurred in enforcing [this] judgment."

4. This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability by any Defendant, or

any employee or agent of Defendant, or any individual thereof, nor is it an admission that Plaintiff suffered any damages.

5. Defendants respectfully submit this offer of judgment. Plaintiff must accept same, in writing, within fourteen (14) days after the service of this documents or else the offer will be deemed withdrawn. See F.R.C.P. 68(b).

Dated: Massapequa, New York  
October 30, 2024



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